

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORCA SECURITY LTD.,)
)
Plaintiff,)
)
v.) C.A. No. 23-758 (JLH)
)
WIZ, INC.,)
)
Defendant.)

STIPULATION AND PROPOSED ORDER

WHEREAS, Plaintiff Orca Security Ltd. (“Orca”) and Defendant Wiz, Inc. (“Wiz;” collectively, the “Parties”) have served Priority Electronic Correspondence production requests (“Priority Requests”) on each other as well as corresponding objections and hit counts pursuant to the Stipulation and Order Regarding Discovery of Electronically Stored Information (D.I. 71; the “ESI Order”);

WHEREAS, the Parties have continued meeting and conferring regarding the Priority Requests;

WHEREAS, the current deadline to submit disputes regarding the Priority Requests is Tuesday, July 16;

WHEREAS, the Parties believe continuing their meet and confer efforts is likely to result in narrowing of their disputes;

WHEREAS, extending deadlines relating to Electronic Correspondence production requests will not affect the time for any Court hearing, conference, or trial;

IT IS HEREBY STIPULATED by the Parties, subject to the approval of the Court, that the following dates in the ESI Order (D.I. 71), shall be amended as follows:

Event	Current Date	Amended Date
Deadline to submit Priority Request disputes	July 16, 2024	July 19, 2024
Deadline to substantially complete production in response to Priority Requests	August 27, 2024	August 30, 2024
Deadline for objections to remaining Electronic Correspondence requests	The later of September 10, 2024 or within 21 days of receipt	The later of September 13, 2024 or within 21 days of receipt

MORRIS, NICHOLS, ARSH & TUNNELL LLP

/s/ Rodger D. Smith II

Jack B. Blumenfeld (#1014)
 Rodger D. Smith II (#3778)
 1201 North Market Street
 P.O. Box 1347
 Wilmington, DE 19899-1347
 (302) 658-9200
 jblumenfeld@morrisnichols.com
 rsmith@morrisnichols.com

Attorneys for Plaintiff

July 9, 2024

RICHARD, LAYTON & FINGER, P.A.

/s/ Christine D. Haynes

Frederick L. Cottrell, III (#2555)
 Kelly E. Farnan (#4395)
 Christine D. Haynes (#4697)
 One Rodney Square
 920 North King Street
 Wilmington, DE 19801
 (302) 651-7700
 cottrell@rlf.com
 farnan@rlf.com
 haynes@rlf.com

Attorneys for Defendant

SO ORDERED, this _____ day of July 2024.

The Honorable Jennifer L. Hall
 United States District Court Judge